

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO.: 00-6181-CR-HUCK  
00-6324-CR-HUCK**

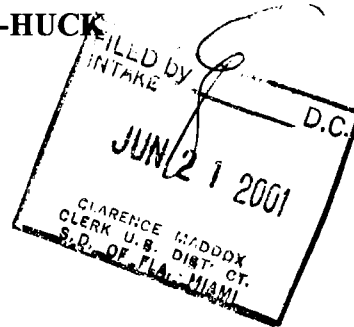
**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**JOHN RAFFA,**

**Defendant.**



**EMERGENCY MOTION TO AUTHORIZE TRAVEL**

COMES NOW the Defendant, JOHN RAFFA, by and through his undersigned attorney, and files this Emergency Motion to Authorize Travel, and in support thereof states the following:

1. On May 7, 2001 the Defendant, JOHN RAFFA, was placed on five (5) years probation with a special condition that he participate in the Home Detention Electronic Monitoring Program for a period of twelve (12) months.

2. The departure sentence was based in part upon the Defendant's role as sole caregiver for his aged aunt who resided with him.

3. JOHN RAFFA's aunt, Rose Baione, died at 2:17 a.m. on June 21, 2001 at the North Broward Medical Center.

4. JOHN RAFFA, as sole caregiver and power of attorney for his aunt, desires to travel to New York City for the funeral and burial of his aunt.

5. If authorized, JOHN RAFFA, would fly from Fort Lauderdale to Lagueardia Airport on Spirit Airlines at 10:50 a.m. on June 22, 2001 and return the following day on a 7:20 p.m. flight to Fort Lauderdale on Spirit Airlines.

6. The funeral is scheduled for Saturday, June 23, 2001 at the Village Chapel Funeral Home located at 6767 Eliot Avenue, Middle Village, Queens in New York and RAFFA's aunt is to be buried at the Calvary Cemetery located in the sub-division of Long Island City in Queens.

7. JOHN RAFFA advised undersigned counsel that his Probation Officer, Brian Hassett, has denied authorization for travel since the Defendant's aunt is not immediate family.

8. According to the Defendant, Probation Officer Hassett also indicated that he would oppose any motion filed by the Defendant seeking authorization to travel.

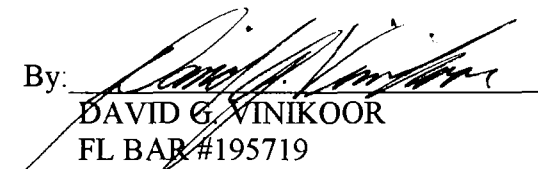
9. Undersigned counsel has been unable to telephonically contact either Probation Officer Brian Hassett or Assistant U.S. Attorney Diana Fernandez.

WHEREFORE, the Defendant, JOHN RAFFA, respectfully requests that he be authorized to travel to New York City to attend the funeral and burial of his aunt.

Respectfully submitted,

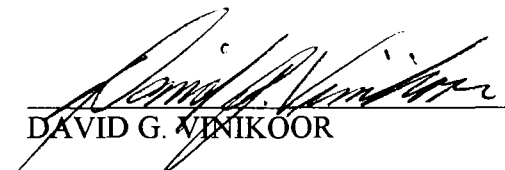
DAVID G. VINIKOOR, P.A.  
Attorney for Defendant  
420 S.E. 12<sup>th</sup> Street  
Fort Lauderdale, FL 33316  
Telephone: (954) 522-2500  
Facsimile: (954) 522-7278

By:

  
DAVID G. VINIKOOR  
FL BAR #195719

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of this Emergency Motion to Authorize Travel has been furnished by U.S. Mail delivery and by facsimile this 21<sup>st</sup> day of June, 2001, to: Diana Fernandez, Assistant United States Attorney, 500 E. Broward Boulevard, Suite 700, Fort Lauderdale, FL 33301 (fax: 356-7336) and to Brian Hassett, U.S. Probation Officer, 501 S. Flagler Drive, 4<sup>th</sup> Floor, West Palm Beach, FL 33401-5912 (fax: 561-655-1049).

  
DAVID G. VINIKOOR